

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

WILLIAM HEATHCOTE individually and on
behalf of all others similarly situated,

Plaintiff,

v.

SPINX GAMES LIMITED, GRANDE GAMES
LIMITED, and BEIJING BOLE TECHNOLOGY
CO., LTD.,

Defendants.

Case No. 2:20-cv-01310-RSM

DECLARATION OF ALMA SUE CROFT

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I, Alma Sue Croft, declare as follows:

1. My name is Alma Sue Croft. I am the mother of William Heathcote, the named Plaintiff in the above-captioned action.
2. I am William Heathcote's successor as defined in RCW § 11.62.005;
3. I have personal knowledge of the facts set forth in this declaration, and, if called as a witness, could and would competently testify thereto under oath.
4. My son, William Heathcote, passed away intestate on January 5, 2022 in Seattle, Washington. *See* Ex. A (Certificate of Death for William Heathcote).¹
5. My son was not married, did not have any children, and his biological father is deceased. I am the sole beneficiary of his property interests, including the interests in his claims against Defendants SpinX Games Limited, Grande Games Limited, and Beijing Bole Technology Co., Ltd.
6. No other person has a superior right to be substituted for my son in the pending action.
7. I wish to proceed with my late son's claim as the class representative, and I will assume all roles and responsibilities of said duties.

I declare under penalty of perjury under the laws of the United States, the State of Alabama, and the State of Washington that the foregoing is true and correct. Executed on February 8, 2022 at Wetumpka, Alabama.


Alma Sue Croft (Feb 8, 2022 18:57 CST)

Alma Sue Croft

¹ An unredacted copy of Mr. Heathcote's Certificate of Death is available to be submitted to the Court should the Court so require.